

IOC/SOC/VOC Waiver Application Key Items for 2018 Submittals

The Arizona Department of Environmental Quality's (ADEQ's) IOC/SOC/VOC waiver program and applications are currently being revised to align with ADEQ's goal of continuous improvement. The revised program will be submitted to EPA for approval and anticipated to start in time for the 2019 submittal.

Until the revised program is available, we wanted to make our customers aware of important aspects of the current waiver program that must be included in your 2018 applications to be considered for approval:

- One application for each Entry Point to the Distribution System (EPDS)
- The Public Water System (PWS) must certify in writing that compliance samples are representative of all Drinking Water (DW) sources to be approved.
- If ADEQ has determined that the PWS is suspect GUDI (Groundwater Under the Direct Influence of Surface Water), the waiver cannot be approved until final GUDI determination is complete.
- When applying for a SOC or VOC use waiver, the PWS must certify in writing that there are no potential sources of contamination within a ½ mile of the drinking water source.
- PWS that are applying for a continuation of their six year VOC or nine year SOC waiver must certify that there have been no changes to the system including:
 - no new sources installed/used),
 - no releases of contaminants or potential sources of release,
 - documentation that the source is in good condition.
- The PWS must document and certify that there are no septic systems within 100 feet of the source (well head).
- The PWS must certify the wells are currently installed as permitted and that all components function as intended and are in good condition. Well construction details must be included with the application.
- A current Source Water Protection Plan (SWPP) that has been updated within the last three years can replace the need for an Adjacent Land Use (ALU) analysis if the SWPP contains the following information:
 - All sources contributing to the EPDSs included in the application have been evaluated, and
 - PWS has verified that sources/ALUs are implementing BMPs or operating under an ADEQ approved operating permit.
- If the PWS has not developed a SWPP the waiver can be approved with appropriate hydrogeologic maps and aquifer characterization calculations which document that no contaminant sources are within a 10-year time of travel of any well source.
- The in-depth hydrogeologic review must include:
 - Maps depicting:
 - Groundwater flow direction
 - Regional geology
 - Groundwater velocity
 - Boring logs with lithologic description
 - Pump test data (if available)
 - Depth to groundwater
 - Nitrate detect and agricultural land use (for SOCs waiver applications)
- Risk analysis of worst case contaminate scenario for sources and ALUs

Criteria for denial:

- If one or more new sources have been added (since the last three monitoring period compliance data has been collected), the waiver cannot be approved.
- Any source within one-year time of travel which could impact groundwater.
- Any source within three-year time of travel if best management practices (BMPs) have not been implemented.
- Existing violation of relevant ADEQ permits (APP, AZPDES, HAZWASTE, UST/LUST).
- Any Water Quality Assurance Revolving Fund (WQARF), uncharacterized release or remedial project within 10-year time of travel.



COMMUNITY INVOLVEMENT COORDINATOR
AZ STATE DEPT OF ENVIRONMENTAL QUALITY
6TH FLOOR, 1110 W WASHINGTON ST STE 127
PHOENIX AZ 85007-9973

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Have Questions? We Are Here to Help.

Vic Scherer

Hydrogeologist

Office: 602-771-4597

E-mail: scherer.victor@azdeq.gov

David Burchard

Hydrogeologist

Office: 602-771-6162

E-mail: burchard.david@azdeq.gov

Water Quality Division

Visit our website:

azdeq.gov



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